1 2 3 4 5 6 7		DISTRICT COURT ICT OF CALIFORNIA
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	CHRISTOPHER WILLIAMS, ET. AL., individually and on behalf all others similarly situated,  AARON BRAXTON, ET. AL., individually and on behalf of all others similar situated,  ALFRED POPE, individually and on behalf of all others similar situated,  WINFRED THOMAS, ET. AL, individually and on behalf of all others similar situated,  IFEOMA EBO, individually and on behalf of all others similar situated, and  ELRETHA PERKINS, ET. AL., individually and on behalf of all others similarly situated, Plaintiffs,  vs.  WELLS FARGO, N.A., a Delaware Corporation; WELLS FARGO HOME MORTGAGE, INC., a Delaware Corporation,	Case Nos. 3:22-cv-00990-JD, 3:22-cv-01748-JD, 4:22-cv-01793-JD, 3:22-cv-01931-CRB, 3:22-cv-02535-JD, and 3:22-cv-3455-JD.
26 27	Defendants.	

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## UNOPPOSED MOTION FOR AN EXTENSION OF 7 DAYS TO SUBMIT JOINT **STATEMENT**

On October 20, 2022, Williams ECF No. 93, the plaintiffs in the following six parallel cases, Williams v. Wells Fargo Bank, N.A., et al., Case No. 3:22-cv-00990-JD (filed Feb. 17, 2022) ("Williams Plaintiffs"); Braxton v. Wells Fargo Bank, N.A., et al., Case No. 3:22-cv-01748-JD (filed Mar. 18, 2022) ("Braxton Plaintiffs"); Pope v. Wells Fargo Bank, N.A. et al., Case No. 4:22cv-01793-JD (filed Mar. 21, 2022) ("Pope Plaintiffs"); Thomas et al. v. Wells Fargo Bank, N.A. et al., Case No. 3:22-cv-01931-CRB (filed Mar. 26, 2022) ("Thomas Plaintiffs"); Ebo v. Wells Fargo Bank, N.A., Case No. 3:22- cv-02535-JD (filed Apr. 26, 2022) ("Ebo Plaintiffs"); and Perkins v. Wells Fargo Bank, N.A., et al., Case No. 3:22-cv-3455-JD (filed June 10, 2022) ("Perkins Plaintiffs"), submit a joint statement regarding a proposal for consolidation by November 4, 2022.

Plaintiffs' counsel for all the cases met in person following the hearing for two hours and have been working diligently and collaboratively with daily phone calls and emails to prepare a proposal to present to defense counsel. Although extensive progress has been made on a joint proposal, there are details that Plaintiffs' counsel wish to work out prior to presenting the proposal to defense counsel and ultimately the Court.

WHEREFORE, Plaintiffs' counsel respectfully request that the deadline to submit a joint statement be extended until November 11, 2022.

Respectfully Submitted,

/s/ Marc E. Dann

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## ATTORNEY ATTESTATION

Pursuant to Civil L.R. 5-1(h)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: November 3, 2022 /s/ Marc E. Dann
Marc E. Dann

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court, Northern District of California using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

/s/ Marc E. Dann
Marc E. Dann